

Raymond|Coleman|Heinold<sup>LLP</sup>  
attorneys at law

325 New Albany Road  
Moorestown, NJ 08057

Tel. 856.222.0100  
Fax 856.222.0411

Stephen G. Raymond  
Thomas J. Coleman, III\*  
Douglas L. Heinold  
Janice L. Heinold\*  
Stephen E. Raymond\*

Gina M. LaPlaca<sup>◇</sup>

William H. Menges<sup>△</sup>  
Edward A. Kondracki<sup>△</sup>

\*Also admitted to practice in the  
Commonwealth of Pennsylvania

<sup>◇</sup>Also admitted to practice  
in the State of New York

<sup>△</sup>Of Counsel

[seraymond@rclawnj.com](mailto:seraymond@rclawnj.com)

March 7, 2022

[Via ECF Filing Only]

Honorable Renee Mari Bumb, U.S.D.J.  
Mitchell H. Cohen Building  
4<sup>th</sup> & Cooper Street  
Camden, New Jersey 08101

**Re: Franklin v. Riverside Township, et al. (Docket No. 17-08838)**  
**Settlement Processing**

Dear Judge Bumb,

As Your Honor is likely aware, at the settlement conference with the Honorable Ann Marie Donio, U.S.M.J., the parties were able to reach an amicable resolution as to the substantive issues in this case.

However, due to the fact that the Township is insured through the Burlington County Joint Insurance Fund and the excess carrier, the Municipal Excess Liability (“MEL”) fund, the settlement must be voted on and approved by the MEL. To be clear, we do not anticipate any issue with approval of this settlement. While we do not want to characterize the process as a rubber stamp, Chris Botta, Liability Claims Counsel for the MEL took part in the settlement conference and will be presenting the settlement for approval. The MEL has historically accepted his recommendations, and there is no reason to believe this case will be an exception to the rule. Unfortunately, the MEL only meets once every two months and just had a meeting last week. Accordingly, the next meeting of the MEL is not until May 4, 2022.

As Your Honor is aware, as a result of the currently scheduled trial date of April 4, 2022, the parties have various deadlines approaching for the submission of pre-trial briefs, jury instructions, verdict sheet, etc. In light of the settlement, and despite the procedural aspect referenced above, the parties are mutually requesting that this matter be removed from the trial list, without prejudice to reinstate, and that those dates be excused.

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Should Your Honor have any questions in this regard, please do not hesitate to contact the parties.

Very truly yours,  
RAYMOND COLEMAN HEINOLD  
*Attorney for Defendants, Megara and Marano*

A handwritten signature in blue ink, appearing to read 'S. E. Raymond', is positioned above the printed name.

Stephen E. Raymond

c.c. Charles Horn, Esquire, *via ECF only*